

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION CORPORATION,	Adv. Pro. No. 08-01789 (CGM)
Plaintiff-Applicant,	SIPA Liquidation
v.	(Substantively Consolidated)
BERNARD L. MADOFF INVESTMENT SECURITIES LLC,	
Defendant.	
In re:	
BERNARD L. MADOFF,	
Debtor.	
IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC, and Bernard L. Madoff,	Adv. Pro. No. 22-01087 (CGM)
Plaintiff,	
v.	
BNP PARIBAS – DUBLIN BRANCH,	
Defendant.	

**STIPULATION AND CONSENT ORDER FURTHER EXTENDING TIME TO
RESPOND TO COMPLAINT**

WHEREAS, on April 27, 2022 the plaintiff, Irving H. Picard (the “Trustee”), as trustee for the liquidation of Bernard L. Madoff Investment Securities LLC (“BLMIS”), under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa-III (“SIPA”), substantively consolidated with the chapter 7 estate of Bernard L. Madoff (“Madoff”), filed a complaint (the “Complaint”) against BNP Paribas - Dublin Branch (the “Defendant” and together with the Trustee, the “Parties”) in this adversary proceeding; and

WHEREAS, on June 8, 2022, Defendant was served with process of the summons and Complaint in this adversary proceeding prior to entering into this Stipulation and Consent Order;

WHEREAS, on July 7, 2022 the United States Bankruptcy Court for the Southern District of New York entered the *Stipulation and Order Extending Time to Respond to Complaint* (ECF No. 8) extending the time for Defendant to respond to the Complaint to October 31, 2022;

WHEREAS, the Parties have conferred and agreed to further extend the time for Defendant to answer, move, or otherwise respond to the Complaint;

THEREFORE, based on the foregoing, the Parties, by their undersigned counsel, hereby stipulate and agree as follows:

1. The time by which Defendant may move, answer, or otherwise respond to the Complaint is adjourned *sine die*.
2. Either Party may, upon the filing of a written notice in this adversary proceeding, set a deadline for the Defendant to answer, move, or otherwise respond to the Complaint, *provided that*, the Parties shall meet and confer at least five days in advance of such filing and shall work in good faith to set a briefing schedule on any motion in response to the Complaint and provided further that, absent prior written agreement from the other Party, the deadline to answer, move or otherwise respond to the Complaint shall be no sooner than 60 days after the date the filing of such notice.
3. The Trustee and Defendant reserve all rights and defenses they may have with respect to the Complaint, including but not limited to defenses based on personal jurisdiction, venue and forum non conveniens, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, except for any defenses based upon sufficiency of service of the Complaint.

4. This stipulation is entered into pursuant to the *Order Granting Supplemental Authority To Stipulate To Extensions Of Time To Respond And Adjourn Pre-Trial Conferences* (ECF No. 5358) in the above-captioned case (No. 08-01789 (CGM)).

Dated: October 13, 2022
New York, New York

/s/ David J. Sheehan

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*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff Investment
Securities LLC and the chapter 7 estate of
Bernard L. Madoff*

SO ORDERED.

/s/ Lisa M. Schweitzer

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*Attorneys for Defendant BNP Paribas - Dublin
Branch*

**Dated: October 14, 2022
Poughkeepsie, New York**



/s/ Cecelia G. Morris

**Hon. Cecelia G. Morris
U.S. Bankruptcy Judge**